

Exhibit 1

Bryson, Santana and Joshua v. Rough Country, LLC

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF GEORGIA
3 GAINESVILLE DIVISION

4 SANTANA BRYSON AND JOSHUA BRYSON,
5 AS ADMINISTRATORS OF THE ESTATE OF
6 C.Z.B., AND AS SURVIVING PARENTS OF
7 C.Z.B., A DECEASED MINOR,

8 Plaintiffs,

9 v.

CASE NO. 2:22-CV-017-RWS

10 ROUGH COUNTRY, LLC,
11 Defendant.
12

13 The videotaped deposition of PAUL LEWIS,
14 JR., M.S., BME, taken on behalf of the Defendant,
15 taken pursuant to agreement of counsel, taken for
16 all purposes authorized by the Federal Rules
17 of Civil Procedure; the reading and signing
18 of the deposition being waived; taken before
19 Leita J. Seaborn, Certified Court Reporter,
20 commencing at 10:38 a.m., on this the 18th day
21 of March 2024, at the law offices of Cannella
22 Snyder, LLC, 315 W Ponce de Leon Ave, Suite 885
23 Decatur, Georgia.
24
25

1 never know to begin with, but I -- I don't have that
2 kind of detail memorized, no, sir.

3 Q. Okay. The incident that occurred in Bacho,
4 was it a rear-end collision?

5 A. No, sir.

6 Q. It was a side-swipe collision; correct?

7 A. It wasn't a side swipe. It was a side impact.
8 It was a T-bone.

9 Q. Well, that's what I meant to say. I'm talking
10 about a T-bone, a side-impact collision.

11 A. Yes, sir.

12 Q. And the collision in Mendoza was a frontal
13 impact collision.

14 A. It's kind of an offset frontal, yes, sir.

15 Q. Neither of them were a rear-end collision.

16 A. They were not.

17 Q. You would admit that the speeds of the
18 vehicles involved in those two incidents are not the
19 same as the speeds involved in the Bryson matter.

20 A. The Delta-v's were -- were different.

21 Q. All right. Do you know the size of the lift
22 kit in the Bacho case?

23 A. I -- I don't recall offhand, no, sir.

24 Q. Do you know the size of the lift kit in the
25 Mendoza case?